

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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KULDEEP SINGH,

Plaintiffs,

- against -

Civil Action No.
22-cv-04235 (BMC)

ALFIA JIVAN, K&A SMOKE SHOP LLC, LIBERTY
NOVELTY, LAS VEGAS LLC AND LIBERTY
NOVELTY, MARYLAND LLC

**STIPULATION OF
DISMISSAL**

Defendant(S),

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This Stipulation is entered into by and between Plaintiff Kuldeep Singh and Defendants,
through their respective attorneys.

RECITALS

WHEREAS, on July 19, 2022, Plaintiff commenced the above action by Summons and
Complaint (the “Complaint”) in the United States District Court, Eastern District of New York;
and

WHEREAS, on August 25, 2022, Plaintiff served Defendant Alfia Jivan personally with
the Complaint;

WHEREAS, on September 14, 2022, Defendant Alfia Jivan appeared by Counsel Baruch
Gottesman and filed a motion for leave to file a letter requesting a pre-motion conference on a
motion to dismiss;

WHEREAS, on October 6, 2022, a pre-motion conference was held; and

WHEREAS, on October 14, 2022, Plaintiff filed an amended Complaint, adding K&A
SMOKE SHOP LLC, LIBERTY NOVELTY, LAS VEGAS LLC AND LIBERTY NOVELTY,
MARYLAND LLC as Defendants.

WHEREAS, on October 14, 2022, Hon. Cogan entered an order, directing Plaintiff to Show Cause by October 21 2022 why this case should not be dismissed for lack of subject matter jurisdiction.

NOW, IN CONSIDERATION OF THE FOREGOING:

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned that Plaintiff hereby withdraws their Amended Complaint, entered at Docket No. 14; and

IT IS FURTHER STIPULATED AND AGREED by and between the undersigned that this instant action be dismissed without prejudice; and

IT IS FURTHER STIPULATED AND AGREED that facsimile or other electronic copies of signatures shall be deemed to be originals for all purposes.

By: /s/ Erica T. Yitzhak
Erica T. Yitzhak
The Yitzhak Law Group
1 Linden Place, Suite 406
Great Neck, New York 11021
(516) 466-7144

Attorneys for Plaintiffs

Dated: October 20, 2022
Great Neck, New York

By: /s /Baruch S. Gottesman
Baruch S. Gottesman
185-12 Union Turnpike
Fresh Meadows, New York
(212) 401-6910

Attorney for Defendant

Dated: October 20, 2022
Queens, New York

SO ORDERED:
Digitally signed by Brian M.
Cogan

Hon. Brian M. Cogan

Dated: Oct. 21, 2022
Brooklyn, New York